

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF NEW YORK
3 CIV. ACTION NO.: 1:20-cv-03395
4 FULL CIRCLE UNITED, LLC,
5 Plaintiff,
6 v.

7 BAY TEK ENTERTAINMENT, INC.,
8 Defendant.

9 _____/
10 BAY TEK ENTERTAINMENT, INC.,
11 Counterclaim Plaintiff,
12 v.

13 FULL CIRCLE UNITED, LLC,
14 Counterclaim Defendant,
15 and
16 ERIC PAVONY,
17 Additional Counterclaim
18 Defendant.

19 _____/
20 Monday, June 20, 2022
21 10:08 a.m. EST - 4:59 p.m. EST

22 CONFIDENTIAL
23 VIDEOTAPED DEPOSITION TAKEN BY REMOTE VIDEOCONFERENCE
24 OF HOLLY HAMPTON, Individually and as 30(b)(6)
25 VOLUME I - Pages 1 - 209

26 Taken on behalf of the Plaintiff before Yvonne
27 Corrigan, RPR, CRR, Notary Public in and for the State
28 of Florida at Large, pursuant to Notice in the above
29 cause.

1 A. Are you asking during deposition prep,
2 or --

3 Q. No time frame.

4 A. I watched a recording by Mr. Pavony
5 entitled something around Mr. Pavony's neighborhood.

6 I mean, there's been news clips, TV clips
7 that I've seen throughout the years, but -- I did watch
8 parts of a recorded conversation with Mr. Pavony and
9 Mr. Cravens. I did see clips of a recording of
10 Mr. Pavony on the phone with Mr. Philippon.

11 There was a recording of Mr. Pavony on a
12 phone call with some Bay Tek employees, I couldn't make
13 out who they were. It sounded like R&D-type employees.

14 Again, I watched a little -- a few clips
15 of it, but it wasn't getting -- it wasn't providing much
16 value.

17 Q. What do you mean, "it wasn't providing
18 much value"?

19 A. There was no need for me to watch all of
20 these videos. I watched some clips of it, and that's
21 it.

22 Q. You mentioned a recording of Mr. -- that
23 you characterized as "Mr. Pavony's neighborhood." Can
24 you provide any information or recall about that
25 recording?

1 A. Somebody made us aware of it shortly
2 after it was put out on the internet and we watched it,
3 I watched it. I think it was passed internally at
4 Bay Tek by a couple of us.

5 Q. When you say someone made you aware of
6 it, do you recall who the individual was that made you
7 aware of the recording that you characterized as
8 "Mr. Pavony's neighborhood"?

9 A. I do not.

10 Q. Do you recall what time frame you were
11 made aware of the recording that you characterize as
12 "Mr. Pavony's neighborhood"?

13 A. It was summer -- summer, I -- within the
14 last few years.

15 Q. When you say "few years," was it in the
16 last three years?

17 A. Probably.

18 Q. Anything else that you can recall about
19 viewing the recording you characterized as "Mr. Pavony's
20 neighborhood"?

21 A. Can you repeat the question, please?

22 Q. Is there anything else that you recall
23 about the recording that you characterize as
24 "Mr. Pavony's neighborhood"?

25 Do you recall --

1 MR. MOVIT: Object to the form.

2 Do you mean anything about the video at
3 all, or anything about communications with
4 Bay Tek folks about the video?

5 MS. CASADONTE-APOSTOLOU: I mean
6 anything.

7 MR. MOVIT: Okay. So the question is, do
8 you recall anything about the video that you
9 haven't testified about, Holly?

10 THE WITNESS: We were disappointed in
11 Mr. Pavony's description of Bay Tek and
12 Mr. Treankler.

13 BY MS. CASADONTE-APOSTOLOU:

14 Q. Why were you disappointed?

15 A. He called us dishonest. That's
16 disappointing because it's -- I would not represent us
17 as dishonest people or dishonest organization.

18 Q. Would you represent that Bay Tek --
19 you're referring to Bay Tek; is that correct?

20 A. Yes, ma'am.

21 Q. Would you refer to Bay Tek as an honest
22 organization?

23 A. Yes, I would.

24 Q. You mentioned -- did someone say
25 something? No.